

Attachment T - Chantilly HQ Maintenance Yard

VDOT MS4 (General Permit No. VAR04)
Chantilly Area Headquarters
VDOT District No. 9

Facility Name: Chantilly Area Headquarters

Location: 14900 Murdock Street, Chantilly, VA, 20151

Latitude: N 38.913271* **Longitude** W 77.462765*

Date of Visit: October 25, 2012

Entry Time: 8:30 a.m. (approx)

Exit Time: 12:30 p.m. (approx)

Site Owner and/or Operator: VDOT – Northern Virginia District

Site Contact: David Klink (TOM II, VDOT)

Conducted by: Max Kuker (PG Environmental, LLC), Anthony D'Angelo (PG Environmental, LLC), Allison Graham (U.S. EPA Region 3), Pete Gold (U.S. EPA Region 3), and Liz Ottinger (U.S. EPA Region 3).

Accompanied by¹: Mason Harper (MS4 Permit Writer, Virginia DCR), Morris Walton (Roadside, VDOT), Tracey Harmon (Water Quality Permits Supervisor, VDOT), David Wilson (HAZMAT Compliance Manager, VDOT), Troy Baker (Crew Leader, VDOT), Josh S. (TOM I, VDOT), Joel Muth (Facilities Electrician, VDOT), Roger Nicholson (TOM II, VDOT), Lee Hixon (Consultant, EEE Consulting, Inc.), and Chris Swanson (Consultant, EEE Consulting, Inc.)

Site Visit Report Prepared by: Anthony D'Angelo (PG Environmental, LLC)

On October 25, 2012, the EPA Inspection Team conducted a site visit at the Chantilly Area Headquarters (hereinafter, Facility). Dry weather conditions were experienced throughout the inspection activities. Weather history reports from the National Oceanic and Atmospheric Administration station Washington Dulles Intl AP 44-8903 indicated that on 10/19/2012, 0.03", and on 10/18/2012, 0.40" and on 10/15/2012, 0.26" of precipitation occurred.

Based on a review and comparison of this site visit location and the United States Census 2000 Urbanized Area designation, it was determined that the Facility is located within the MS4 Compliance Area. The Facility houses two maintenance headquarters: the Chantilly Maintenance Headquarters, and the Clifton Maintenance Headquarters. The Facility TOM II stated that maintenance operations between the two maintenance headquarters are usually separated. The Facility comprises multiple buildings (e.g., office buildings, vehicle maintenance building, and storage buildings), a vehicle fueling island, and vehicle/equipment storage areas. Various activities are conducted at the Facility, including the following: vehicle washing, storage, and fueling, salt/sand/brine storage, and snow removal equipment storage. The Facility has a drainage area of 46 acres and stormwater runoff from the Facility is primarily conveyed to both a salt pond and on-site stormwater basin.

¹ Sign-in sheets for the site visit are provided after the photograph log.

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The salt pond receives stormwater runoff via storm drain inlets from a large impervious portion of the Facility where salt related equipment storage (salt spreader storage) and activities occur (brine mixing, salt dome loading/unloading, etc.). The on-site stormwater basin receives flow from Murdock Street and a large portion of the remaining impervious area at the Facility, including the area outside the maintenance shop, vehicle/equipment storage area, and fueling area. The stormwater basin discharges to the southwest to Cub Run, via an unnamed stabilized channel. VDOT personnel (Facility and HQ) were not aware of who owned and maintained the unnamed channel. The salt pond has an overflow spillway that connects the salt pond to the stormwater basin. In addition, stormwater runoff at the northern and eastern portions of the Facility discharge into an adjacent forested area or is percolated into the ground.




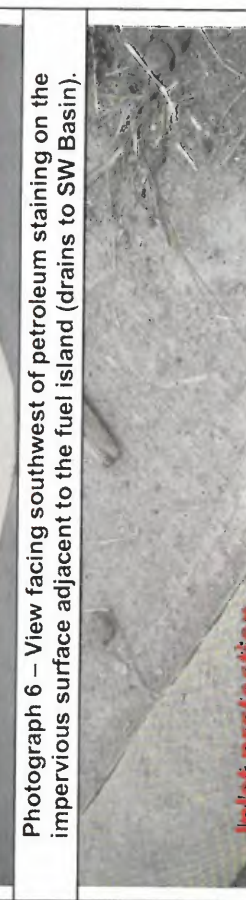
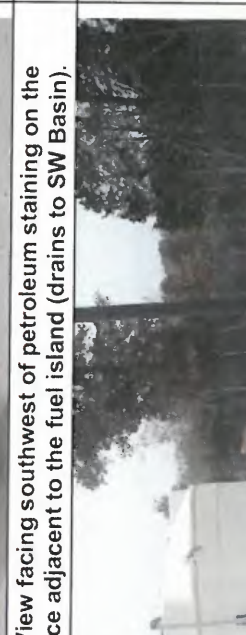
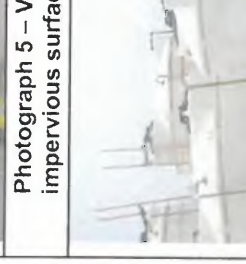
The EPA Inspection Team observed/obtained the following with regard to the Facility:

1. At the time of the inspection a formal plan for addressing stormwater pollution prevention and good housekeeping at the Facility had not been developed (e.g., Stormwater Pollution Prevention Plan). The VDOT Facility Manager explained that contractors are used to perform maintenance and conduct area snow removal activities. He further explained that contractors regularly visit the site to obtain and connect VDOT equipment to their vehicles and had not been trained by VDOT on pollution prevention activities to be followed at the Facility.
2. The VDOT Facility Manager explained that MS4 training was scheduled for Facility staff the Tuesday prior to the EPA Inspection (10/16/2012); however, the training had been canceled. The VDOT Facility Manager explained that other than the VDOT Facility Crew Leader, the VDOT Facility staff had not received the VDOT MS4 Training or any other stormwater pollution prevention training. The EPA Inspection Team requested records for the MS4 training and VDOT provided the records in the VDOT Response Inventory (see VDOT Response Inventory Item No. 44C).
3. The VDOT Facility Manager explained that the Facility Safety Officer conducts a yearly audit of the Facility; however, documentation of the inspections was not provided by VDOT to demonstrate that the inspections included stormwater pollution prevention. In addition, he stated that daily and weekly inspections of the fuel island are conducted; however, VDOT only provided one inspection record for an inspection that occurred at the Facility fuel island on October 5, 2011. This record was provided in the VDOT Response Inventory (see VDOT Response Inventory Item No. 46.A). He added that formal documented inspections of the Facility are not conducted on a regular basis.
4. The VDOT Facility Manager explained that vehicle washing is conducted inside the vehicle maintenance building which VDOT staff stated is connected to an oil-water separator and discharges to the sanitary sewer.
5. Visible petroleum staining was observed on the impervious surface adjacent to the Facility maintenance shop on the east side of the Facility (see Photographs 1 and 2). Facility staff explained that the majority of the stains were from leaking equipment parked at the maintenance shop that were scheduled to be taken off-site for further repairs. This area of the Facility drains to the stormwater basin.
6. A floor drain was located inside of the vehicle wash bay area. Inspectors noted that the floor drain was almost full and that it had oil staining and dirt around its perimeter. Facility staff explained that the floor drain is used monthly and washed/cleaned out after use. Inspectors did not observe the floor drain cleaning while on site.

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7. Heavy rust/petroleum/salt staining was observed underneath multiple pieces of salt dispensing equipment on the northern side of the Facility (see Photographs 3 and 4). This area of the Facility drains to the on-site salt pond.
8. Visible petroleum staining was observed on the impervious surface at the fuel island in the south-central portion of the Facility (see Photographs 5 and 6). This area of the Facility drains to the stormwater basin.
9. Storm drain inlet protection on the west side of the Facility did not protect the entire storm drain inlet (see Photographs 7 and 8). An approximate six inch section of the storm drain inlet was observed exposed. The inlet protection appeared to be newly installed to the EPA Inspection Team. This area of the facility drains to the on-site salt pond.

Site Photographs	VDOT MS4 (General Permit No. VAR04) Chantilly Area Headquarters VDOT District No. 9	Photograph Date: 10/25/2012
		<p>Photograph 1 – View facing east of petroleum staining on the impervious surface adjacent to the Facility maintenance shop (drains to SW Basin).</p> <p>Photograph 2 – View facing southeast of petroleum staining on the impervious surface adjacent to the Facility wash bay (drains to SW Basin).</p>
		<p>Photograph 3 – Close-up view of petroleum, rust, and salt staining on the impervious surface on the north-central side of the Facility (salt pond).</p> <p>Photograph 4 – View facing northeast of petroleum, rust, and salt staining on the impervious surface on the north-central side of the Facility.</p>

<h1>Site Photographs</h1>	VDOT MS4 (General Permit No. VAR04) Chantilly Area Headquarters VDOT District No. 9	Photograph Date: 10/25/2012
		
		

Sign-in Sheet

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Site Visit Date: 10/25/2012

MS4 PROGRAM EVALUATION SIGN-IN SHEET (PLEASE PRINT)

Permittee: Chantilly Area Headquarters Date conducted: 10/25/2012
Permit No.

Name	Title	Company	Department	Phone
Anthony D'Angelo	Inspector	PG Environmental	EPA Contractor	303-279-1778
Jason Ricker	USACE	USACE	PES	410-962-3027
Karl Kerr		USACE	PES	410-962-4417
Jared Scott		USACE	PES	410-962-7445
Allison Gresham	Inspector	EPA	NPDES Enforcement	215-814-2333
Pete Gold	Inspector	EPA	NPDES Enforcement	215-814-5236
Morris Walton	Roadside	VDOT	Maintenance	804-786-0942
Max Kulor	Inspector	EPA Contractor		703-707-8258
Troy BAKER	Crew leader	VDOT	Maintenance	571-262-0706
Josh Smith	Team	VDOT	Access	571-262-6705
Joel Murth	Facilities Elec.	VDOT	Facilities	571-221-9135
Liz Offinger	Env. Engr.	EPA	NPDES Permits	215-814-5783
Mason Harper	MS4 Permit Rep.	VA On	Stormwater	804-225-2557

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